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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SCOTT FRIEDMAN, an individual,)
)
Plaintiff,)
)
v.)
)
UNITED STATES OF AMERICA;)
GENE M. TIERNEY, individually and)
in his official capacity as an FBI Agent;)
MATTHEW A. ZITO, individually and)
in his official capacity as an FBI Agent;)
THAYNE A. LARSON, individually and)
in his official capacity as an FBI Agent;)
LAS VEGAS METROPOLITAN)
POLICE DEPARTMENT; JOE LEPORE,)
P#6260, individually and in his official)
capacity as an officer of the LAS VEGAS)
METROPOLITAN POLICE)
DEPARTMENT; DARREN HEINER,)
P#2609, individually and in his official)
capacity as an officer of the LAS VEGAS)

Case No. 2:18-CV-000857-JCM-VCF

**STIPULATION AND ORDER TO
EXTEND BRIEFING SCHEDULE ON
DEFENDANT, JULIE BOLTON'S
MOTION TO DISMISS [ECF No. 56]**

(Third Request)

1 METROPOLITAN POLICE)
 2 DEPARTMENT; JASON HAHN, P#3371,)
 3 individually and in his official capacity)
 4 as an officer of the LAS VEGAS)
 5 METROPOLITAN POLICE)
 6 DEPARTMENT; Tali Arik, an individual;)
 7 Julie Bolton, an individual; and Arik)
 8 Ventures, an entity formed by Tali Arik,)
 9 Defendants.)
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8 IT IS HEREBY STIPULATED and AGREED by and between Defendant JULIE
 9 BOLTON, by and through her counsel STEPHEN G. CASTRONOVA and THOMAS D.
 10 DILLARD, JR., and Plaintiff SCOTT FRIEDMAN, by and through his counsel, MELANIE A.
 11 HILL and LISA A. RASMUSSEN, that the briefing deadlines on Ms. Bolton's Motion to
 12 Dismiss [ECF No. 56] be extended. This is the third request to extend the briefing deadlines.

13 This Stipulation is executed for the following reasons:

- 14 1. Ms. Bolton filed her Motion to Dismiss [ECF No. 56] on August 20, 2018 ("the
- 15 Motion").
- 16 2. Counsel for Plaintiff filed a Motion to Extend Deadline to Respond to Defendant,
- 17 Julie Bolton's Motion to Dismiss Plaintiff's Complaint on September 4, 2018 so that
- 18 counsel for the parties could confer to resolve some of the arguments made in
- 19 support of the Motion to streamline the claims Plaintiff will pursue against Ms.
- 20 Bolton.
- 21 3. Counsel for the parties met and conferred on September 5, 2018 on the Motion and
- 22 agreed to extend the deadline for Plaintiff to respond to Ms. Bolton's Motion for at
- 23 least another two weeks so counsel could more meaningfully confer the following
- 24 week.
- 25 4. The Court granted Plaintiff's Motion to Extend on September 11, 2018 extending the
- 26 deadline to oppose Ms. Bolton's Motion to September 11, 2018.
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- 1 5. Counsel for the parties further met and conferred on September 11, 2018 to discuss
2 streamlining the claims and Plaintiff amending the Complaint against Ms. Bolton to
3 address Ms. Bolton's arguments in her Motion.
- 4 6. Counsel for the parties agreed to extend Plaintiff's deadline to file a response to Ms.
5 Bolton's Motion to September 28, 2018 to allow the parties additional time to confer
6 and determine how best to proceed against Ms. Bolton. Counsel for the parties
7 further agreed to extend the deadline for Ms. Bolton to file a reply to October 12,
8 2018.
- 9 7. The parties are continuing to meet and confer to discuss amending Mr. Friedman's
10 complaint against Ms. Bolton to streamline the claims against Ms. Bolton and
11 address Ms. Bolton's arguments raised in her Motion. The parties are working
12 towards alleviating the need for further briefing on the Motion with an Amended
13 Complaint against Ms. Bolton.
- 14 8. Counsel for the parties have agreed to extend Plaintiff's deadline to file a response to
15 Ms. Bolton's Motion, if necessary, to October 29, 2018 to allow the parties
16 additional time to confer and Amend the Complaint. Counsel for the parties further
17 agreed to extend the deadline for Ms. Bolton to file a reply, if necessary, to
18 November 13, 2018.
- 19 9. The request for additional time in this Stipulation is made in good faith.
- 20 10. This is the third request to extend the deadlines.
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11. The requested extension is not for purposes of delay, but to avoid unnecessary litigation or the wasting of resources and expense on issues that can be resolved between counsel for the parties or through amendment of the complaint.

Dated this 28th day of September, 2018.

Respectfully submitted by,

CASTRONOVA LAW OFFICES, PC

MELANIE HILL LAW PLLC

By: /s/ Stephen G. Castronova
STEPHEN G. CASTRONOVA
Nevada Bar No. 7305
Attorney for Defendant Julie Bolton

By: /s/ Melanie A. Hill
MELANIE A. HILL
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Attorney for Plaintiff Scott Friedman

OLSON, CANNON, GORMLEY,
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LAW OFFICE OF LISA RASMUSSEN, P.C.

By: Thomas D. Dillard, Jr.
THOMAS D. DILLARD, JR.
Nevada Bar No. 6270
Attorney for Defendant Julie Bolton

By: /s/ Lisa A. Rasmussen
LISA A. RASMUSSEN
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Attorney for Plaintiff Scott Friedman

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